

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

AUG 9 2020

David J. Bradley, Clerk

United States of America)

v.)

Madeline Deanna AGUILAR)

DOB (07/22/1992))

United States Citizen)

Case No. M-20-1495-MDefendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 9, 2020 in the county of Starr in theSouthern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC 841

21 USC 846

Did knowingly possess and intentionally possess with intent to distribute approximately 10.48 kilograms of methamphetamine in the crystal form, a Schedule II controlled substance, and did conspire with persons known and unknown to knowingly and intentionally possess with intent to distribute approximately 10.48 kilograms of methamphetamine in the crystal form, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to
and attested to telephonically as per Fed. R. Cr. P.4.1
Reviewed by AUSA Robert Guerra

/s/ Hector Berlanga*Complainant's signature*Hector Berlanga HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: August 9, 2020. 10:21 p.m.City and state: McAllen, TexasPeter E Ormsby*Judge's signature*Peter Ormsby, U.S. Magistrate Judge*Printed name and title*

ATTACHMENT A

Before the United States Magistrate Judge, Southern District of Texas, Hector Berlanga, Special Agent, United States Immigration and Customs Enforcement, being duly sworn, deposes and says the following:

On Saturday, August 8, 2019 at approximately 9:00 A.M., CBPOs working outbound operations at the RGC POE inspected AGUILAR's Ford Fusion and noticed grease stains on the aftermarket compartment and missing screws.

On Sunday, August 9, 2020 at approximately 9:20 A.M., AGUILAR attempted to enter the United States through the RGC POE driving her Ford Fusion car. AGUILAR and the Ford Fusion were referred due to a lookout placed on the vehicle. At secondary inspection CBPOs discovered 10 bundles hidden inside the compartment weighing 10.48 kilograms. All 10 bundles field tested positive for the characteristics of methamphetamine a Schedule II controlled substance.

United States Homeland Security Investigations, Falcon Dam, Texas, Special Agents were notified and responded to the scene. HSI Special Agents read AGUILAR her Declaration of Rights, witnessed by CBPO Martinez and stated that she understood and waived her rights. AGUILAR provided the following non-verbatim statement:

AGUILAR stated that she purchased the Ford Fusion on January 2019 and has been traveling into Camargo, Mexico 2-3 times a week to visit her 70-year-old father. AGUILAR stated that on March of 2019, her brother accidentally hit and killed a relative of a Gulf Cartel member while driving a vehicle and was severely punished for the accident. A Cartel member took AGUILAR's Ford vehicle for 3 weeks and then returned it back to her informing her that she would be working for the Gulf Cartel transporting narcotics.

AGUILAR stated that on May 2019, after crossing from Mexico, an unknown male subject appeared at her residence in Rio Grande City, Texas. The unknown male subject took AGUILAR's Ford Fusion from her and later returned it a few hours later. AGUILAR stated that she told the Cartel members that she was willing to transport narcotics into the U.S. to pay off her brother's accident. AGUILAR stated that she knows that it is illegal to transport narcotics from Mexico into the United States.